

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA**

CHARLESTON DIVISION

KEITH LOWE,

Plaintiff,

v.

Case No. 2:25-cv-000272

**JONATHAN FRAME, Superintendent of
Mt. Olive Correctional Complex, et al.**

Defendants.

NOTICE OF WITHDRAWAL AND SUBSTITUTION OF COUNSEL

Pursuant to Local Rule 83.4(b), please enter the withdrawal of appearance of Jonathan M. Calhoun of the West Virginia Attorney General's Office, as counsel on behalf of Defendants Superintendent Jonathan Frame and Commissioner David Kelly.

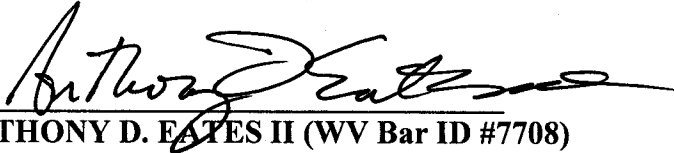
The undersigned does certify that Anthony D. Eates, Deputy Attorney General, of the Education, Arts, and Boards Division of the West Virginia Attorney General's Office, is assuming representation of said Defendants in the above-styled matter from Jonathan M. Calhoun and has accepted all responsibilities relating to the representation. Said withdrawal and substitution will not delay the trial or other progress of the case and this notice is given more than 90 days prior to trial. All communication, including notices, pleadings, discovery, and other documents pertaining to this matter should be served upon counsel at the following address:

Anthony D. Eates, Esq.
Deputy Attorney General
State Capitol Complex, Building 6, Suite 402
1900 Kanawha Boulevard East
Charleston, West Virginia 25305

Respectfully submitted,

**SUPERINTENDENT JONATHAN FRAME and
COMMISSIONER DAVID KELLY**
By Counsel

**JOHN B. McCUSKEY
ATTORNEY GENERAL**

A handwritten signature in black ink, appearing to read "Anthony D. Eates II", written over a horizontal line.

**ANTHONY D. EATES II (WV Bar ID #7708)
DEPUTY ATTORNEY GENERAL**

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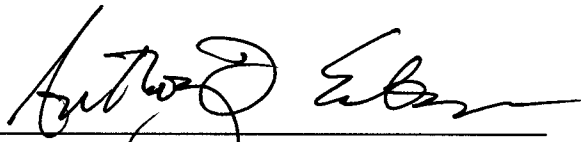
Defendants.

CERTIFICATE OF SERVICE

I, Anthony D. Eates, Assistant Attorney General for the State of West Virginia and counsel for the Defendants Jonathan Frame and David Kelly, do hereby certify that a true and accurate copy of the foregoing "***NOTICE OF WITHDRAWAL AND SUBSTITUTION OF COUNSEL***" was filed the 26th day of August, 2025, via the CM/ECF system, which will send notification to the following:

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ANTHONY D. EATES